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President of The Church of Jesus Christ of  
Latter-day Saints*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

LAURA A. GADDY, individually and  
on behalf of all others similarly  
situated,

Plaintiffs,

v.

CORPORATION OF THE  
PRESIDENT OF THE CHURCH OF  
JESUS CHRIST OF LATTER-DAY  
SAINTS, a Utah corporation sole,

Defendant.

**RESPONSES TO MOTIONS  
FOR LEAVE (DOCKETS 105 &  
106)**

Case No. 2:19-cv-00554-RJS

The Honorable Robert J. Shelby  
The Honorable Dustin B. Pead

Defendant Corporation of the President of The Church of Jesus Christ of Latter-day Saints (the “Church”) hereby responds to Ms. Gaddy’s “Motion for Leave to File Proposed Second Amended Complaint” (Docket 105) and her “Motion to Amend [Proposed] Second Amended Complaint Filed as Ex. 1 to ‘Motion for Leave to File Proposed Second Amended Complaint’” (Docket 106).

The Church provides its “written consent” to Plaintiff’s request to file an amended complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. Plaintiff’s Motion for Leave to File Proposed Second Amended Complaint is now moot, as no Court action is required under Rule 15 if all parties stipulate to the filing of an amended pleading.<sup>1</sup>

The Church also does not oppose Ms. Gaddy’s request to make certain corrections and amendments to the proposed Second Amended Complaint. Thus, her “Motion to Amend [Proposed] Second Amended Complaint Filed as Ex. 1 to ‘Motion for Leave to File Proposed Second Amended Complaint’” (Docket 106) is also moot. The Church requests, however, that Ms. Gaddy make all changes referenced in her motion, as well as any other edits she deems necessary prior to filing the new Second Amended Complaint. That will result in a single document containing all the operative allegations in this case. After that Second Amended

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<sup>1</sup> The Church notes that several weeks prior to the filing of Ms. Gaddy’s motion, counsel for the Church advised Ms. Gaddy’s counsel that it would likely agree to the filing of an amended complaint by way of a stipulated motion. Counsel for Ms. Gaddy indicated that she preferred “to still file [the] motion along with the proposed [Second Amended Complaint] and [the] stipulation with Judge Shelby for him to decide.”

Complaint is filed, the Church will respond consistent with Rule 12 of the Federal Rules of Civil Procedure.

DATED: October 12, 2021.

STOEL RIVES LLP

/s/ David J. Jordan

David J. Jordan

Wesley F. Harward

*Attorneys for Defendant Corporation of  
the President of The Church of Jesus  
Christ of Latter-day Saints*